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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OPEN SOCIETY JUSTICE INITIATIVE,
Plaintiff,

v.

OFFICE OF THE DIRECTOR OF
NATIONAL INTELLIGENCE,
Defendant.

20 Civ. 06625 (PAE)

ORAL ARGUMENT REQUESTED

NOTICE OF CROSS-MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiff's Cross-Motion for Summary Judgment and in Opposition to Defendant's Motion for Summary Judgment, the Declaration of Ashika Singh, and all exhibits and attachments thereto, the undersigned, attorneys for the Open Society Justice Initiative ("OSJI") hereby move this Court for an order pursuant to Federal Rule of Civil Procedure 56 granting Plaintiff OSJI summary judgment against Defendant Office of the Director of National Intelligence ("ODNI") and denying Defendant's motion for summary judgment and for such other and further relief as the Court deems just and proper. The reasons supporting this motion are set forth in the concurrently filed memorandum.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's current scheduling Order of December 3, 2020 (Doc. No. 20), opposition papers, if any, must be served upon counsel of record no later than February 3, 2021.

Dated: January 13, 2021
New York, NY

Respectfully submitted,

/s/ Catherine Amirfar
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